

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

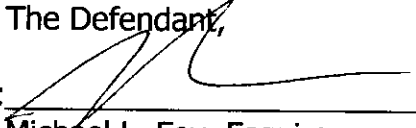
UNITED STATES OF AMERICA)
)
v.)
)
FRANK DEPERGOLA)

CRIMINAL ACTION NO. 05-30002-MAP

MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant, through counsel, and requests this Honorable Court to modify his conditions of release to allow him to travel to Sussex, New Brunswick, Canada from June 5, 2005 to June 11, 2005; and asserts as his reasons therefore, defendant, Depergola, requests to travel to New Brunswick, Canada, with his family during the aforementioned dates. The defendant had filed a previous motion to modify on May 26, 2005, which was assented to by U.S. District Attorney Ariane Vuono and approved by the Court, however he did not make the scheduled trip at that time as he was unable to secure accommodations.

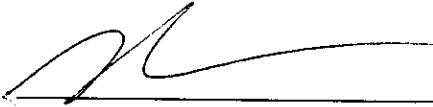
The defendant has attached a copy of his itinerary to the within motion.

The Defendant,
By: 
Michael L. Foy, Esquire
935 Main Street
Springfield, MA 01103
(413) 781-1106
BBO#176920

CERTIFICATE OF SERVICE

I, Michael L. Foy, do hereby certify that I have on this date served a copy of the foregoing document to Assistance United States Attorney, Ariane D. Vuono, in hand of same to her at the United States District Court, 1550 Main Street, Springfield, MA 01103.

Date: 6/1/05


Michael L. Foy, Esquire